

### **REMARKS**

Claims 1-7 remain pending in the application.

The Applicants respectfully request the Examiner to reconsider earlier rejections in light of the following remarks. No new issues are raised nor is further search required as a result of the changes made herein. Entry of the Amendment is respectfully requested.

#### **Claims 1-7 over Huang**

In the Office Action, claims 1-7 were rejected under 35 USC 102(b) as allegedly being anticipated by WO 97/23078 to Huang (“Huang”). The Applicants respectfully traverse the rejection.

Claims 1 and 2 recite a single coder/decoder having a **SINGLE** digital/analog conversion channel time division multiplexed among, and a **SINGLE** analog/digital conversion channel concurrently coupled to, a plurality of processors. Claims 3-7 recite time division multiplexing a first plurality of processors to a digital signal input of a single coder/decoder having a **SINGLE** digital/analog conversion channel, and a **SINGLE** analog/digital conversion channel, and an analog-to-digital converted signal **concurrently accessible** to **all** of the first plurality of processors. Thus, claims 1-7 recite a system and method that rely on **single** coder/decoder.

The Examiner argues in the Response to Arguments section of the Office Action that Huang discloses a digital/analog conversion 15 that equates to the claimed features, i.e., “single if it is one of the two in the pair itself is a single converter” (See Office Action, page 4). The Applicants respectfully disagree.

The Examiner acknowledges that Huang discloses a **pair** of coders/decoders. A **pair** of coders/decoders is by definition two coders/decoders. Thus, by any interpretation two coders/decoders is **NOT** a **single** coder/decoder, i.e., the recited **single** coder/decoder does **NOT** read on Huang’s two coders/decoders. One of a pair of coders/decoders is just that, one of a **PAIR** of coders/decoders. Huang’s invention could not operate properly without a pair of coders/decoders and thus the Examiner cannot simply ignore the fact that there are two coders/decoders. Hence, the rejection should be

withdrawn because it fails to demonstrate that the applied reference discloses each and every element of the claim. See MPEP 2131. "The identical invention must be shown in as complete detail as is contained in the ... claim." Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). "Anticipation cannot be predicated on teachings in the reference which are vague or based on conjecture." Studiengesellschaft Kohle mbH v. Dart Industries, Inc., 549 F. Supp. 716, 216 USPQ 381 (D. Del. 1982), aff'd., 726 F.2d 724, 220 USPQ 841 (Fed. Cir. 1984).

The Examiner agrees in the Response to Arguments section of the Office Action that Huang discloses an "analog to digital converted signal concurrently accessible to all of the CPUs 21 and DSPs 22" in Fig. 3a (See Office Action, page 4). The Applicants respectfully disagree.

The Examiner is correct that Huang discloses a pair of coders/decoders (See Fig. 3a, items 15). However, **NOWHERE** within Huang does it mention that a signal from any one of the coders/decoders is made available to more than one component on the other side of the time-division multiplexing bus 19 at the same time, i.e., concurrently, much less made available to a plurality of processors concurrently through use of multiplexing, as recited by claims 1-7.

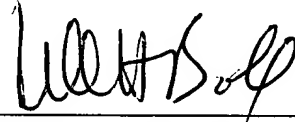
The Applicants specifically recite a **single** coder/decoder coupled to a plurality of processors because a **single** coder/decoder overcomes the deficiencies in the prior art, such as Huang's use of a plurality of coders/decoders that increase costs. A system relying on a plurality of coders/decoders is proportionally expensive relative to the number of coders/decoders used. However, by multiplexing a **single** coder/decoder a system and method can service a plurality of processors at a reduced cost. The cited prior art fails to disclose the claimed features having such benefits.

For these and other reasons, claims 1-7 are patentable over the prior art of record. It is therefore respectfully requested that the rejections be withdrawn.

**Conclusion**

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'William H. Bollman', written over a horizontal line.

William H. Bollman

Reg. No. 36,457

**MANELLI DENISON & SELTER PLLC**

2000 M Street, NW 7<sup>th</sup> Floor

Washington, DC 20036-3307

TEL. (202) 261-1020

FAX. (202) 887-0336

WHB/df